

## **REMARKS**

As a preliminary matter, Applicants appreciate the Examiner's allowance of claim 58.

Claim 16 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Nishida et al. (U.S. Patent No. 6,052,168) in view of Oh et al. (U.S. Patent No. 6,812,985 B1). In response Applicants amended independent claim 16 to clarify that the first and second groups of stripe electrodes are in parallel to each other along a surface of each of the substrates that are alternately provided, and respectfully traverse the rejection as it applies to the amended claim.

In the Office Action on page 3, the Examiner cites Nishida as teaching a plurality of stripe electrodes (1-2 and 20) and second (1, 20) groups of stripe electrodes parallel to each other. However, in Nishida, the pixel electrode 2 and pixel electrode 1, which correspond to the first and second groups of stripe electrodes of the present application, are in parallel to each other in a thickness direction of each substrate. The opposing electrode 1 of Nishida, which corresponds to the transparent electrode of the present application, is formed on the substrate that pixel electrode 2 is formed. Opposing electrode 1 and the liquid crystal sandwich the pixel electrode 2. However, Nishida fails to disclose or suggest forming the opposing electrode 1 on a substrate different from the thin film transistor (TFT) substrate on which pixel electrode 2 is formed.

With respect to Oh, the liquid crystal display apparatus disclosed therein is not an IPS type of display apparatus. Moreover, the transparent conductive metal layer 125 is not equivalent to the transparent electrode of the present application. This is because the transparent conductive metal layer merely has a shielding capability. For these reasons, Applicants submit that the cited references fail to disclose or suggest first and second groups of stripe electrodes which are in parallel to each other along a surface of each of the substrates that are alternately provided, as now recited in amended claim 16. Accordingly, withdrawal of the §103 rejection of claim 16 is respectfully requested.

Claim 17 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Nishida in view of Oh, and further in view of Ohe et al. (U.S. Patent No. 5,600,464). Applicants respectfully traverses the rejection for the reasons recited above with respect to the §103 rejection of claim 16.

Since claim 17 ultimately depends upon claim 16, it necessarily includes all the features of its associated independent claim plus other additional features. Thus, Applicants submit that the §103 rejection of claim 17 has also been overcome for the same reasons mentioned above to overcome the rejection of independent claim 16, and also because Ohe fails to overcome the above-described deficiencies of Nishida and Oh. More specifically, Ohe is merely cited by the Examiner to describe the material of the alignment layer and volume resistivity of the alignment and insulating layer. For this reason, Applicants respectfully request withdrawal of the §103 rejection of claim 17.

Claim 65-66 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Nishida in view of Oh, or Nishida in view of Oh in view of Ohe, and further in view of Shin et al. (U.S. Patent No. 6,271,903 B1). In response, Applicants traverse the rejection for the reasons recited above with respect to the rejection of claim 16.

Since claims 65-66 ultimately depend upon independent claim 16, Applicants submit that the §103 rejection of these claims has been overcome for the reasons recited above, and also because Shin fails to overcome the deficiencies of the Nishida, Oh, or Ohe references. More specifically, Shin is merely cited by the Examiner for disclosing that the voltage applied to the common lines and common electrodes would be the same as the voltage applied to an electrode on an opposite substrate. For these reasons, withdrawal of the §103 rejection of claims 65-66 is respectfully requested.

Claim 29 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Nishida in view of Oh in view of Shin, and further in view of Kim (U.S. Patent No. 6,177,970 B1). In response, Applicants amended independent claim 29 similar to claim 16, and traverse the rejection as it applies to the amended claim.

The deficiencies of Nishida, Oh and Shin are discussed above. Kim is merely cited by the Examiner as disclosing an analogous LCD in which an analogous insulating layer is partially removed. Kim fails to disclose or suggest first and second groups of stripe electrodes, which are in parallel to each other along a surface of each of the substrates and

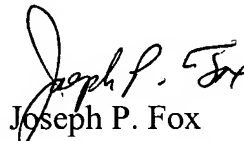
are alternately provided, as now recited in amended claim 29. For these reasons, withdrawal of the §103 rejection of claim 29 is respectfully requested.

For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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